

# EXHIBIT 4

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

1 2 3 4 5 6 7 8 9 10 11	INNOVATIV MEDIA GROUP, INC., a Wyoming corporation;  Plaintiff,  v.  FTE NETWORKS, INC., a Nevada corporation; LATERAL U.S. CREDIT OPPORTUNITIES FUND, LP; RICHARD DE SILVA; DOES I-X; ROE Entities, I-X,  Defendants.	12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<b>DECLARATION OF CHRIS FERGUSON</b>
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I, CHRIS FERGUSON, declare as follows:

1. I am over the age of 18 years old and, unless stated to be on information and belief, have personal knowledge of the facts as set forth herein and could and would competently testify thereto if called upon to do so.

2. I am the Manager of TBK 327 Partners, LLC ("TBK").

3. It has come to my attention that, in 2019:

a. TTP8, LLC ("TTP8") represented to FTE that it had acquired legal right, title, and interest in certain promissory notes previously issued by FTE to TBK and still held by TBK at that time; and

b. based on that representation of legal right, title, and interest in such notes, obtained from FTE certain FTE common stock shares as part of a debt cancellation transaction.

4. That representation by TTP8 was and still is false.

5. Moreover, I was unaware of any discussions between TTP8 and/or Mr. Suneet Singal and FTE in any way related to these promissory notes which were properly and exclusively TBK's at that time and still are to date.

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1           6.       While TTP8, through Mr. Singal, attempted to acquire this FTE debt from TBK by  
2 way of a "Pledge and Purchase Agreement" in or around October 16, 2019, that transaction never  
3 closed and no consideration at all was ever exchanged in performance thereof.

4           7.       At all times, from the date these promissory notes were first issued to TBK to the  
5 present, TBK has considered itself and is, in fact, the legal owner and holder thereof.

6           8.       I have not had any further communications with either TTP8 or Mr. Singal since the  
7 above-referenced 2019 transaction failed to close.

8           9.       Also, while I was aware of the February 2022 attempt by FTE's claimed  
9 shareholders, including TTP8 and Innovativ Media Group ("Innovativ"), to amend FTE's bylaws,  
10 I never indicated to TTP8 or Innovativ that TBK supported such bylaws amendment attempt.

11          10.       Specifically, Mr. Tom Coleman, who represented to me that he was the principal of  
12 Innovativ, , contacted me and indicated that he believed FTE had value..

13          11.       I requested related and supporting information from him.

14          12.       He responded and provided me with a copy of the proposed bylaws amendment, but  
15 I did not sign it as he requested, either on behalf of myself or TBK.

16          13.       I did not have any other conversations with Mr. Coleman and/or Innovativ in any  
17 way related to FTE after I declined to sign the proposed bylaws amendment.

18               I declare under penalty of perjury under the laws of the State of Nevada that the foregoing  
19 is true and correct to the best of my knowledge.

20               Executed on March 7 2023 in Bethlehem, Pennsylvania, Northampton County.

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22  
23                                 
Chris Ferguson